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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 15-00051-JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	CONTINUING HEARING DATE AND
v.)	EXCLUDING TIME FROM SEPTEMBER 18, 2015
)	TO OCTOBER 23, 2015
THANH P. TRUONG and)	
JEFFREY MENIES,)	
)	
Defendants.)	

The defendants, Thanh P. Truong, represented by Angela Hansen, and Jeffrey Mennies, represented by Garrick S. Lew, and the government, represented by Scott D. Joiner, Assistant United States Attorney, hereby stipulate and agree as follows:

1. The Court notified the parties that it is unavailable for the status conference currently scheduled for September 18, 2015, and provided later dates of availability, which include October 23, 2015.

2. The parties have conferred and agree that October 23, 2015, is the best available date given the respective schedules of counsel and ongoing discovery.

3. The parties therefore jointly request that the Court continue the September 18, 2015,

1 status conference until October 23, 2015, at 8:30 AM.

2 4. The Court previously excluded time under the Speedy Trial Act through and including
3 September 18, 2015, for the effective preparation of counsel.

4 5. The parties agree that in light of ongoing discovery, it remains appropriate to exclude
5 time under the Speedy Trial Act for effective preparation of counsel through and including the date of
6 the newly requested hearing date of October 23, 2015.

7 **SO STIPULATED.**

8 Date: September 14, 2015

BRIAN J. STRETCH
Acting United States Attorney

9
10 /s/
SCOTT D. JOINER
11 Assistant United States Attorney

12 Date: September 14, 2015

13 /s/
ANGELA HANSEN
14 Attorney for Thanh. P. Truong

15
16 Date: September 14, 2015

17 /s/
GARRICK S. LEW
18 Attorney for Jeffrey Mennies

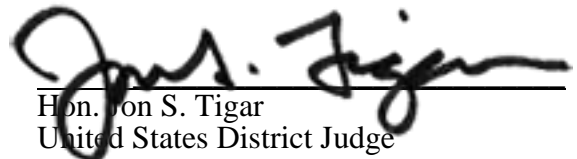
~~[PROPOSED]~~ ORDER

Pursuant to stipulation, IT IS HEREBY ORDERED that the court proceeding currently scheduled on September 18, 2015, at 9:30 a.m., be continued to October 23, 2015, at 8:30 a.m.

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between September 18, 2015, and October 23, 2015, would unreasonably deny the defendant continuity of counsel and would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between September 18, 2015, and October 23, 2015, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY ORDERED that the time between September 18, 2015 through and including October 23, 2015, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: September 14, 2015 _____


Hon. Jon S. Tigar
United States District Judge